

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION  
SERVICE CHANGES, 2011

Docket No. N2012-1

**RESPONSE OF THE UNITED STATES POSTAL SERVICE  
TO AMERICAN POSTAL WORKERS UNION INTERROGATORY  
REDIRECTED FROM WITNESS DAVID WILLIAMS  
(APWU/USPS-T1-47(d))**

The United States Postal Service hereby files an institutional response to the above-listed interrogatory of the American Postal Workers Union dated February 23, 2012. The interrogatory has been redirected from witness Williams to the Postal Service for an institutional responses. The interrogatory is stated verbatim and followed by the response. Responses to parts (a-c) of APWU/USPS-T1-47 were filed on April 6, 2012.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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## **INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE TO AMERICAN POSTAL WORKERS UNION INTERROGATORY**

**APWU/USPS-T1-47** In its February 23, 2012 press kit, the Postal Service states that is has determined that of the 52 facilities for which AMPs were not required, 40 will be consolidated.

. . .

d) What is the dollar value savings that the Postal Service has attached to these facilities and how have those savings numbers been determined?

### **RESPONSE**

(a-c) [Responses filed April 6, 2012]

(d) The aggregate network workhour changes, volume shifts, productivity improvements, operational and cost savings analyses performed by witnesses Neri, Martin, Bradley and Smith incorporate operational changes arising from consolidation of these facilities. No AMP-like business cases utilizing facility-specific data were performed.